

**IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF DELAWARE**

JOHN R. PURNELL III,  
PLAINTIFF,

V.

DELAWARE DEPT. OF INSURANCE,  
KAREN WELDIN-STEWART,  
NOEL EASON PRIMOS,  
WILCOX & FETZER LTD.,  
LEXITAS, NEXT GEN,  
JESSICA WILLEY,  
ROBIN DAVID, NICOLE HOLECEK,  
FRANK PYLE, and BANKERS  
INSURANCE COMPANY,  
DEFENDANTS.

CASE NO. 1:20-cv-01058-RGA

**AFFIDVAIT IN SUPPORT OF  
ENTRY OF DEFAULT**

STATE OF DELAWARE                    }  
  } S.S.  
COUNTY OF NEW CASTLE            }

NOW BEFORE ME, Ryan M Hardister, a Notary Public for the State of Delaware in the County of New Castle, comes **JOHN R. PURNELL III**, who swears under the penalty of perjury and deposes the following:

1. I am 18 years of age or older and am a citizen of the United States of America.
2. I have first-hand intimate knowledge about the above-captioned case matter.
3. I am the plaintiff in the above-captioned case matter.
4. I filed my initial complaint against the captioned defendants on August 11, 2020.
5. All defendants were served, and the summons returned to this Court as executed on October 28, 2020.

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6. On September 21, 2020, defendant Bankers Insurance Company filed its' Motion to Dismiss for Failure to State a Claim along with its' Opening Brief in support thereof.

7. All defendants in this matter, excepting Bankers Insurance Company, were time-barred from filing an Answer to my complaint on November 17, 2020.

8. To date, said defendants have failed to answer, plead, or otherwise defend against the allegations submitted in the complaint.

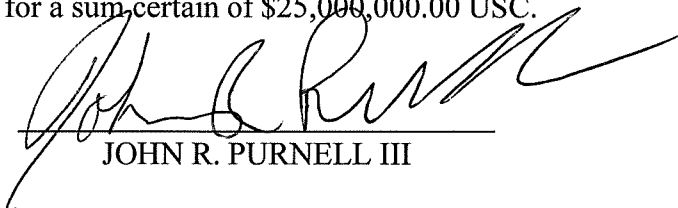
9. The remedial action by this Honorable Court is to make an entry of default by the Clerk of the Court.

10. The instant affidavit is in support of the request for an entry of default filed by me on December 8, 2020.


11. None of the defaulted defendants are members of the U.S. Armed Forces.

12. None of the defaulted defendants are incompetent or infants.

13. My complaint is for a sum certain of \$25,000,000.00 USC.

  
\_\_\_\_\_  
JOHN R. PURNELL III

**SWORN TO AND SUBSCRIBED BEFORE ME THIS 14 DAY OF May, 2021**

  
\_\_\_\_\_  
NOTARY PUBLIC

